

6. This Court has original subject matter jurisdiction of this action according to 28 U.S.C. § 1332, which states that “The district courts shall have original jurisdiction of all civil actions where the matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, and is between (1) citizens of different States.”
 7. Plaintiff Warren Shults is a resident of North Platte, Nebraska and therefore is a citizen of Nebraska.
 8. National Union is a corporation organized and existing under the laws of the State of Pennsylvania and its principal place of business is located in New York City, New York and is therefore a citizen of Pennsylvania and New York.
 9. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs, as Plaintiff has made demand upon National Union in the amount of \$600,000 by letter dated December 29, 2016 which is attached hereto and marked Exhibit 2.
 10. As this is a civil action where the matter in controversy exceeds the sum or value of \$75,000 and is between citizens of different States, this Court has original subject matter jurisdiction pursuant to 28 U.S.C. §1332.
 11. Removal of this action is not barred by 28 U.S.C. §1441(b)(2) as National Union, the sole Defendant, is not a citizen of Nebraska, the State in which such action is brought.
 12. Removal is proper pursuant to 28 U.S.C. § 1441.
 13. National Union will file a notice of this removal in the District Court for Lincoln County, Nebraska, and will serve a copy of it and this Notice of Removal on Plaintiff’s counsel.
- Respectfully submitted this 31st day of July, 2017.

Place of Trial: Lincoln, Nebraska.

NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA.,
Defendant

By: /s/ J. Scott Paul

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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of July, 2017 I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of such filing to the following and I hereby certify that I have mailed by United States Postal Service the document to the following:

Vincent J. Dugan
Brouillette, Dugan & Troshynki, P.C., LLO
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/s/ J.Scott Paul